



U.S. Department of Justice

United States Attorney
Southern District of New York

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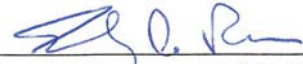
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

March 22, 2021

The March 24 status conference is adjourned to May 28, 2021 at 10:30 a.m. Speedy trial time is excluded from March 24, 2021, until May 28, 2021, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 3/23/2021
New York, New York

By ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Santos, et al.*, 20 Cr. 481 (ER)

Dear Judge Ramos:

The Government writes to respectfully request, with consent from defense counsel, that the status conference currently scheduled for March 24, 2021, be adjourned for a period of 60 days. The adjournment will enable the government to produce any additional discovery, defense counsel to review discovery and consider what, if any motions are to be made, and for the parties to engage in any discussions of potential pretrial resolutions of the matter. The adjournment will also allow the parties to complete discussions of a protective order in this matter with counsel for Erik Suarez.

Should the Court grant this request, the parties also request that the time be excluded under the Speedy Trial Act between March 24, 2021, through the next scheduled conference because the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A). The Government consulted with defense counsel and counsel for Thomas Santos, Jeffrey Guzman, and Victor Del Valle have consented to exclusion of time. Counsel for Adrean Coombs and Erik Suarez did not take a position on exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney
Southern District of New York

By: /s/
Jarrod L. Schaeffer / Elizabeth A. Espinosa
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cc: Counsel of Record (via ECF)